

FILED

JUL 07 2023

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY BKA DEP CLK

NO. 4:23-mj-1079-JG

IN THE MATTER OF THE )  
CRIMINAL COMPLAINT FOR )  
ISAIAH EMMANUELLE GIBBS )  
MOTION TO SEAL APPLICATION  
AND AFFIDAVIT FOR CRIMINAL  
COMPLAINT

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby moves this Honorable Court for an Order sealing the Application and Affidavit for the Criminal Complaint regarding the above-referenced matter, and this Motion to Seal, and in support thereof, shows unto the Court as follows:

1. Task Force Officer Amber Taylor of the Bureau of Alcohol, Tobacco, Firearms and Explosives is on this date making an application for a Criminal Complaint, regarding the above-named defendant. Attached to the affidavit in support of the application for a criminal complaint, as Attachment A.

2. The affidavit submitted in support of the Criminal Complaint contains information identifying cooperating individuals as well as substantial background information concerning an ongoing investigation being conducted by ATF, with the assistance of the United States Attorney's Office. Disclosure of the affidavit would alert potential targets of the existence, scope, and details of the investigation and,

therefore, would pose a risk of flight or the destruction of additional evidence, and may otherwise compromise the investigation. See Baltimore Sun Co. v. Goetz, 886 F.2d 60 (4th Cir. 1989).

WHEREFORE, the Government moves for an Order sealing the Application and Affidavit for Criminal Complaint, including Attachment A, and this Motion to Seal, until one year from the date of issuance of this Court's Order, except that a filed copy of the same be provided to the United States Attorney's Office and the Bureau of Alcohol, Tobacco, Firearms and Explosives.

Respectfully submitted, this 6<sup>th</sup> day of July 2023.

MICHAEL F. EASLEY, JR.  
United States Attorney

BY: 

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